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**CENTRAL DISTRICT OF CALIFORNIA**

10 STEPHEN TURNER, an individual,  
11 Plaintiff,  
12 vs.  
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14 TINISH, LLC, a limited liability  
company  
15 Defendants.  
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Case No.: 8:23-cv-04883-WLH-AGR

**PLAINTIFF'S NOTICE OF  
VOLUNTARY DISMISSAL OF  
ENTIRE ACTION WITH  
PREJUDICE PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 41(a)(1)**

1 **PLEASE TAKE NOTICE** that Plaintiff STEPHEN TURNER (“Plaintiff”) pursuant  
2 to Federal Rule of Civil Procedure Rule 41(a)(1), hereby voluntarily dismisses the  
3 entire action *with prejudice* pursuant to Federal Rule of Civil Procedure Rule 41(a)(1)  
4 which provides in relevant part:

5 **(a) Voluntary Dismissal.**

6 (1) By the Plaintiff.

7 (A) *Without a Court Order.* Subject to Rules 23(e), 23.1(c), 23.2, and  
8 66 and any applicable federal statute, the plaintiff may dismiss an  
9 action without a court order by filing:

10 (i) A notice of dismissal before the opposing party serves either  
11 an answer or a motion for summary judgment.  
12

13 Defendant TINISH, LLC, a limited liability company has neither answered Plaintiff’s  
14 Complaint, nor filed a motion for summary judgment. Accordingly, Defendant may be  
15 dismissed with prejudice and without an Order of the Court.

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17 ASCENSION LAW GROUP, PC

18 DATE: December 4, 2023

19 /s/ Pamela Tsao

20 Pamela Tsao, attorney for Plaintiff

21 Stephen Turner  
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